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April 26, 2021

Honorable Denise L. Cote
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY. 10007

VIA ECF

Re: United States vs. Mario Reynoso-Hiciano
Case No 20-Cr. 388 (DLC)

Dear Judge Cote:

As the Court is aware, I represent the above named defendant. Mr. Reynoso-Hiciano entered a plea of guilty on February 4, 2021. The Court set a sentencing date of May 7th, 2021. The Court also set a defense submission date of April 23, 2021. At this time, I am respectfully requesting an additional time, until May 3, 2021, to file our defense submission. This request is made based on COVID-19 and my inability to meet with Mr. Reynoso-Hiciano's family as well as a language barrier. I have spoken to Assistant United States Attorney Daniel Wolf, who has no objection to this request. The government however, would request an additional day to May 4, 2021, to file their submission.

Additionally, in response to questions posed by the Court, please be advised that I have spoken to my client and he consents to proceed via video conference technology. If video conference technology is not available, he will consent to proceed via telephone conference. Thank you for your anticipated consideration in this matter. If you have any questions please feel free to contact my office.

Yours Truly,

s/Barry Goldberg

Barry Goldberg, Esq.

SO ORDERED:



Honorable Denise L. Cote

4/28/21

CC: AUSA DANIEL WOLF